

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON


JOSEPH R. GOODWIN
UNITED STATES DISTRICT JUDGE

**IN RE: ETHICON, INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION**

**Master File No. 2:12-MD-02327
MDL No. 2327**

**THIS DOCUMENT RELATES TO
THE CASES ON THE EXHIBIT
ATTACHED HERETO**

**JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE**

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs whose cases are listed on the attached Exhibit A and Defendants Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), acting pursuant to F. R. Civ. P. 41(a)(1)(A)(ii), jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Tim K. Goss

Tim K. Goss
FREESE & GOSS
3500 Maple Ave., Suite 1100
Dallas, TX 75219
Counsel for Plaintiff

/s/ William Gage

William Gage
BUTLER SNOW LLP
P.O. Box 6010
Ridgeland, Mississippi 39158-6010
Counsel for the Ethicon Defendants